

4. The Commission produced the Massey Documents to Farmer's counsel in the same format as the Commission received them from Massey. Thus, those Massey Documents that did not contain metadata were produced to Farmer's counsel also without metadata.

5. Attached as Exhibits A, B, and C are true and correct copies of certain of the Massey Documents that the Commission obtained from Massey and produced to Farmer's counsel as described in Paragraph 3 of this declaration.

6. Attached hereto as Exhibit D is a true and correct copy of the transcript of the August 8, 2016 deposition of Charles Grob.

7. Attached hereto as Exhibit E are true and correct copies of certain documents produced to the Commission and to Farmer's counsel by the U.S. Attorney's Office for the Southern District of Texas.


8. Attached hereto as Exhibit F is a true and correct copy of the subpoena the Commission served on Farmer on December 5, 2012.

9. Attached hereto as Exhibit G is a true and correct copy of excerpts from the transcript of the July 17, 2015 deposition of Andrew I. Farmer.

10. Attached hereto as Exhibit H is a true and correct copy of Plaintiff's First Request for Production of Documents to Defendant Andrew I. Farmer, which the Commission served on Farmer in this action.

11. I declare under penalty of perjury that the foregoing is true and correct.

Executed on the 18th day of January, 2017.



Nikolay V. Vydashenko